

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 19-1631-DHU

KAMAL BHULA, et al.

Defendant.

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE OBJECTIONS TO
THE PRESENTENCE REPORT**

COMES NOW, the defendant Kamal Bhula, by and through Nicole W. Moss, counsel for Defendant, and hereby moves this Court to enter an Order extending the deadline to file his objections to the Presentence Investigation Report (“PSR”). As grounds therefore Defendant states as follows:

1. The Presentence Investigation Report regarding Mr. Bhula was filed on September 15, 2023. [Doc. 590]
2. The defendant’s deadline to file any objections to the PSR is currently set for September 29, 2023.
3. Ms. Moss is scheduled to meet with Mr. Bhula on Thursday, September 28, 2023 at Cibola County Correctional Center to review the PSR. That was the first appointment available for Ms. Moss to meet with Mr. Bhula in person.
4. Counsel is unable to communicate effectively with Mr. Bhula by phone or by video visit due to Mr. Bhula undergoing an invasive surgery on his face in February of 2022.

5. As a result of that surgery, Mr. Bhula cannot speak clearly and defense counsel must communicate in person in order to understand him.
6. Following that meeting, counsel anticipates needing additional time to draft any objections.
7. Mr. Bhula respectfully requests an extension of one week to October 6, 2023 to file any objections to the presentence report.
8. This short extension will not cause any undue delay or prejudice to any of the parties in this matter.
9. Sentencing has not yet been scheduled in this matter.
10. Assistant United States Attorney Letitia Simms has no objection to the relief sought in this motion.

Wherefore, for the foregoing reasons, Mr. Bhula respectfully moves this Court for an extension of time to file objections to the PSR up to and including October 6, 2023.

Respectfully Submitted by:

/s/ Nicole W. Moss
Nicole W. Moss
Law Office of Nicole W. Moss
514 Marble Ave. NW
Albuquerque, NM 87102
(505) 244-0950

I hereby certify that a true and correct copy of the foregoing pleading was electronically delivered to all parties via CM/ECF, this 26th day of September, 2023.

/s/ Nicole W. Moss
Nicole W. Moss